

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re:	§	
	§	
DEEP MARINE HOLDINGS, INC.,	§	Case No. 09-39313
Et al.	§	
	§	Jointly Administered
Debtors.	§	Chapter 11

DEEP MARINE 1, LLC,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Adversary No. 10-03271
	§	
THE DEEP MARINE LIQUIDATING	§	
TRUST (AS SUCCESSOR TO DEEP	§	
MARINE TECHNOLOGY	§	
INCORPORATED, DEEP MARINE	§	
HOLDINGS, INC., DEEP MARINE 1,	§	
LLC, DEEP MARINE 2, LLC, DEEP	§	
MARINE 3, LLC, AND DEEP MARINE	§	
4, LLC); ET AL.	§	
	§	
Defendants.	§	

AGREED MOTION TO EXTEND THE DISCOVERY DEADLINE

General Electric Capital Corporation (“GE”) and The Deep Marine Liquidating Trust (“Liquidating Trust”) file this Motion to Extend the Discovery Deadline and, in support thereof, state as follows:

1. On October 18, 2010 this Court entered a Comprehensive Scheduling Order (“Scheduling Order”) setting the discovery deadline for January 14, 2011 in the above matter.

2. On December 14, 2010 the Liquidating Trust and GE attended Court ordered mediation with all parties, held in Adversary No 10-3312, in an attempt to reach a global settlement of all claims, which was unsuccessful. Since mediation, the Liquidating Trust and GE have been exploring the possibility of settling the Liquidating Trust's claims against GE.

3. While settlement negotiations continue, the Liquidating Trust and GE are currently scheduling depositions and have been exchanging available dates. The parties have agreed to extend the discovery deadline until January 31, 2011 in order that all depositions requested by each party may be completed.

4. This adversary proceeding is currently set for trial on April 28, 2011. Thus, extending the discovery deadline until January 31, 2011 will not prejudice either the Liquidating Trust or GE as the parties prepare for trial.

5. The relief requested in this Agreed Motion is not sought for purposes of delay, but in the interest of justice.

WHEREFORE, the Liquidating Trust and GE pray that this Court enter an Order GRANTING their Agreed Motion to Extend the Discovery Deadline from January 14, 2011 to January 31, 2011, and for all other relief each party may be entitled to in law and equity.

Respectfully submitted,

BRACEWELL & GIULIANI LLP

By: /s/ Jason Cohen

William Alfred Wood, III
Jason G. Cohen
Texas Bar No. 24050435
Jason.Cohen@bgllp.com
Bracewell & Giuliani LLP
711 Louisiana, Suite 2300
Houston, TX 77002
Telephone: (713) 223-2300
Facsimile: (713) 221-1212

***Attorneys for Plaintiff, Deep Marine 1, LLC and
Defendant, The Deep Marine Liquidating Trust***

ADAMS AND REESE LLP

By: /s/ Susan C. Mathews

John Duck^{*}
Federal Bar No. 17156
Susan C. Mathews
State Bar No. 05060650
FBN: 8479
Michael N. Mire
State Bar No. 24010757
FBN: 599148
4400 One Houston Center
1221 McKinney
Houston, TX 77010
Telephone: (713) 652-5151
Facsimile: (713) 652-5152

***Attorneys for Defendant,
General Electric Capital Corporation***

^{*} Admitted in the State of Louisiana.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served electronically via the Court's ECF notice on the parties listed below on this 7th day of January, 2011:

/s/ Susan C. Mathews

Susan C. Mathews

SERVICE LIST

<p><u>Counsel for Plaintiff – Deep Marine 1, LLC</u> William Alfred Wood, III Bracewell & Giuliani LLP 711 Louisiana St, Ste 2300 Houston, TX 77002 713-221-1416 Fax : 713-221-1212 Email: trey.wood@bgllp.com</p> <p>Jason Gary Cohen Bracewell & Giuliani LLP 711 Louisiana St, Ste 2300 Houston, TX 77002 713-221-1416 Fax : 713-222-3209 Email: jason.cohen@bgllp.com</p>	<p><u>Deep Marine Liquidating Trust</u> John Bittner, Liquidating Trustee Grant Thornton LLP 1717 Main Street Suite 1500 Dallas TX 75201 214-561-2300 Fax: 214-561-2370 Email: John.Bittner@GT.com</p>
<p><u>Counsel for Defendant – Noble Denton Marine, Inc.</u> Jeff Goebel GL Noble Denton, Inc. 5177 Richmond Ave Suite 900 Houston, TX 77056 281-657-2265 Fax: 713-586-7007 Email: jeff.goebel@nobledenton.com</p>	<p><u>Counsel for Defendant – BNA Marine Services, LLC</u> David W. Barry Barry & Sewart, PLLC 4151 Southwest Freeway Suite 680 Houston, TX 77027 713-722-0281 Fax : 713-722-9786 Email: bankruptcy@barryandsewart.com</p>

<p><u>Counsel for Defendant – Otto Candies, LLC</u> Thomas S Henderson, III Thomas S Henderson, Attorney at Law 711 Louisiana, Ste 3100 Houston, TX 77002 713-227-9500 Fax: 713-620-3023 Email: thenderson@tsh-atty.com</p>	<p><u>Counsel for Defendant – B&J Martin, Inc.</u> Jacques P. DeGruy Mouledoux, Bland, Legrand & Brackett 701 Poydras St., Ste 4250 New Orleans, LA 70139 504-595-3000 Fax: 504-522-2121</p>
<p><u>Defendant – NREC Power Systems, Inc.</u> Bryan F. Chaisson CEO/Vice President 5222 Hwy 311 Houma, LA 70360-2878 Kip Crighton 985-851-4743 Email: Alexander@cajunnet.net</p>	<p><u>Counsel for Defendant – CapRock Communications, Inc.</u> Edward L Rothberg Hoover Slovacek, LLP 5847 San Felipe, Suite 2200 Houston, TX 77057 713-977-8686 Fax : 713-977-5395 Email: rothberg@hooverslovacek.com</p>
<p><u>Counsel for Defendant – Bollinger Shipyards Texas City, LP</u> Stephen Lynn Williamson Montgomery Barnett et al 1100 Poydras, Ste 3300 New Orleans, LA 70163 504-585-3200 Email: swilliamson@monbar.com</p>	<p><u>Counsel for Defendant – Aramark U.S. Offshore Services, LLC</u> Angela Sheffler Abreu McCarter & English Four Gateway Center 100 Mulberry Newark, NJ 07102 973-848-5378 Email: aabreu@mccarter.com</p>
	<p><u>Counsel for Defendant – Crossmar, Inc.</u> Andrew T. Lilly Montgomery Barnett, LLP 3300 Energy Centre 1100 Poydras Street New Orleans, LA 70163 504-585-7637 Fax: 504-200-8937 Email: alilly@monbar.com Ryan Matthew McCabe Montgomery Barnett L.L.P. 3300 Energy Centre 1100 Poydras Street New Orleans, LA 70163 504-585-7683 Fax: 504-200-8983 Email: rmccabe@monbar.com</p>

	<p>Stephen Lynn Williamson Montgomery Barnett et al 3300 Energy Centre 1100 Poydras New Orleans, LA 70163 504-585-3200 Email: swilliamson@monbar.com</p>
--	--